

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

RAUDEO PANGANIBAN

vs.

AMERICAN AUTOMAR INC., OSPREY  
SHIP MANAGEMENT, INC., AND APL  
MARITIME LTD.

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C.A. No. 4:13cv2302

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**JOINT MOTION TO DISMISS**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiff, RAUDEO Z. PANGANIBAN, and Defendants, AMERICAN AUTOMAR, INC., OSPREY SHIP MANAGEMENT, INC. and APL MARITIME LTD., and file this Joint Motion to Dismiss the above-entitled and numbered cause with prejudice and respectfully show unto this Honorable Court as follows:

I.

Plaintiff, RAUDEO Z. PANGANIBAN, and Defendants, AMERICAN AUTOMAR, INC., OSPREY SHIP MANAGEMENT, INC. and APL MARITIME LTD. have agreed upon a compromise and settlement of all claims and disputes which were or could have been asserted by Plaintiff against said Defendants. Accordingly, all parties hereto jointly move the Court for an Order of Dismissal of the Plaintiff's Original Complaint and all amendments thereto with prejudice with each party to bear their respective costs of Court.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, RAUDEO Z. PANGANIBAN and Defendants, AMERICAN AUTOMAR, INC., OSPREY SHIP MANAGEMENT, INC. and APL MARITIME LTD., pray that this Motion come on for consideration and that at the time thereof, it be

granted and that they have such other and further relief, both general and special, at law and in equity, to which they may show themselves justly entitled.

Respectfully submitted,

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MARITIME, LTD., AMERICAN AUTOMAR  
INC. AND OSPREY SHIP MANAGEMENT,  
INC.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served upon all counsel of record herein in accordance with the Texas Rules of Civil Procedure on the 20<sup>th</sup> day of MAY, 2014.

Ronald L. White  
Ronald L. White